

*** Filed ***
10:45 AM, 11 Jul, 2025
U.S.D.C., Eastern District of New York

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC) (JRC)

NOTICE OF CROSS MOTION

PLEASE TAKE NOTICE, that upon the attached Declaration of Carlos Roa., dated July 10, 2025, and upon the accompanying Memorandum of Law, non-party and Pro Se former Third-Party Defendant and Counter Claimant will move this Court at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11021, at a date and time to be determined by the Court, for an Order granting Carlos Roa to intervene as of right or in the alternative by permission of this Court pursuant to Federal Rule of Civil Procedure Rule 24 and seeks to file a memorandum of law in opposition to Defendants Safa Abdulrahman Gelardi letter motion, Docket Entry 546.

Dated: New York, New York
July 11, 2025,

Carlos Roa
Pro Se former Third-Party Defendant
and Counter Claimant
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